

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MICHAEL RICHARD LYNCH AND
STEPHEN KEITH CHAMBERLAIN

Defendants.

CASE NO. 3:18-cr-00577-CRB

**[PROPOSED] ORDER GRANTING
DEFENDANT STEPHEN
CHAMBERLAIN'S MOTION FOR BILL
OF PARTICULARS**

Date: November 24, 2021

Time: 1:30 p.m.

Crtrm.: 6

Assigned to Hon. Charles R. Brever

[PROPOSED] ORDER

Good cause having been shown, the Court GRANTS Defendant Stephen Chamberlain's Motion for Bill of Particulars pursuant to Federal Rule of Criminal Procedure 7(f).

IT IS HEREBY ORDERED that the government produce Bills of Particulars that set forth with specificity the following information:

1. Identify, with specificity, all “agreements,” “contracts,” “transactions,” “invoices,” “statements,” “entries to Autonomy’s books and records,” “quarterly and annual reports,” and “other documents” referenced in Paragraphs 22(a) through 22(j) of the Superseding Indictment (ECF No. 21) (“SI”), as well as the names of all alleged coconspirators the government contends participated in each instance of conduct.

2. Identify all “others,” “co-conspirators,” “Autonomy officers,” “finance officers,” and “employees” referenced in Paragraphs 23 and 24 of the SI and its subparagraphs.

3. Identify all “false and misleading statements” that the government alleges were made by Chamberlain or his alleged coconspirators in Paragraphs 24(a) through 24(e) of the SI, as well as the approximate dates on which the government alleges those statements were made, the identity of the specific coconspirator the government alleges made the statement, and what the government contends was false and misleading about each such statement.

4. Identify the specific “writings, signs, signals, pictures, and sounds,” that the government intends to present at trial as to Count 1, as alleged in Paragraph 26 of the SI, including the dates on which the government alleges that Chamberlain or any of his alleged coconspirators “did transmit, and caused to be transmitted by means of wire communication in interstate and foreign commerce,” those “writings, signs, signals, pictures, and sounds,” and the names of the coconspirators who made each alleged transmission.

5. For each of Counts 2 through 15 (Paragraph 28 of the SI), identify (1) any coconspirators, and/or aiders and abettors that the government alleges committed each offense; (2) any alleged victims of each alleged offense; and (3) the specific theory of liability the government intends to pursue against Chamberlain.

6. For each overt act allegedly committed in furtherance of the conspiracy charged in

1 Count 17 in Paragraphs 34(a) through (q) of the SI, identify (1) which of the four alleged objects
2 of the conspiracy (as stated in Paragraph 32) the government alleges were furthered by the act; (2)
3 the identities of all alleged coconspirators the government alleges participated in the act; and (3)
4 the basis on which the government contends that the act furthered the alleged conspiracy.

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DATED: _____

Honorable Charles R. Breyer
United States District Court Judge
Northern District of California